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UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA
(TUCSON)

In re:
MARY ABIGAIL PLANTADO,
DIONATHAN PLANTADO,
Debtors.

Proceedings in Chapter 13
Bk. No.: 2:19-bk-15467-BMW
**OBJECTION OF CONN APPLIANCES,
INC. D/B/A CONN'S HOMEPLUS AS
SERVICER-IN-FACT AND ATTORNEY-
IN-FACT FOR CONN CREDIT I, LP TO
CONFIRMATION OF CHAPTER 13 PLAN**

Conn Appliances, Inc. d/b/a Conn's HomePlus as servicer-in-fact and attorney-in-fact for Conn Credit I, LP ("Creditor"), by and through its undersigned counsel, hereby objects to the Chapter 13 plan filed by Mary Abigail Plantado and Dionathan Plantado (hereinafter referred to as "Debtors") on December 30, 2019 at Docket No. 11, and avers in support thereof as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1334 and 11 U.S.C. § 1325.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1408 and/or 1409.
3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(L).
4. On December 19, 2019, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code, and relief was ordered thereon.
5. On January 10, 2020, Creditor filed a Proof of Claim.

6. The Proof of Claim seeks a secured debt in the amount of \$4,287.21. The debt was incurred for a thing of value on September 2, 2019. The debt is therefore subject to the “hanging paragraph” of 11 U.S.C. § 1325(a) and must be paid in full through the plan with an interest rate consistent with the holding of In re Till, 541 U.S. 465 (2004). A copy of the Contract giving rise to Creditor’s claim is attached to the Proof of Claim.

7. Debtors' plan proposes improperly to bifurcate the debt.

8. Because the Debtors' proposed Chapter 13 Plan fails to correctly provide for the debt, the plan does not comply with the provisions of 11 U.S.C. § 1325(a) and confirmation should therefore be denied.

WHEREFORE, Conn Appliances, Inc. d/b/a Conn's HomePlus as servicer-in-fact and attorney-in-fact for Conn Credit I, LP requests this Honorable Court enter an Order denying confirmation of the proposed Chapter 13 Plan.

Respectfully submitted, this 6th day of February, 2020.

/s/ Mary Farrington-Lorch
MARY FARRINGTON-LORCH
Attorney for Creditor, Conn Appliances, Inc.

Copy of the foregoing mailed this
6th day of February, 2020 to:

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1 /s/ *Mary Farrington-Lorch*
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